

Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Notice of Market-Dominant)
Price Adjustment)

Docket No. R2013-10

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(September 30, 2013)

Pursuant to Rules 3001.21(a) and 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and explanation from the Postal Service concerning the billing determinant used in this docket. The proposed questions seek information to allow participants provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules, and allow the Commission to make a fully informed, reasoned determination on whether the proposal meets applicable legal and regulatory requirements.

Proposed Questions

1. Please confirm that starting January 26, 2014, Full-Service Intelligent Mail barcodes are required to qualify for automation First Class, Standard Mail, Periodicals, and Bound Printed Matter prices. See Federal Register Notice, 78 FR 23137 (April 18, 2013). If not confirmed, please explain.
2. The following table, taken from tab "Presort" of file "CAPCAL-FCM-R2013-10.xls," details that over 14 billion First Class Automation letters, flats, and cards did not contain a Full Service Intelligent Mail Barcode in the hybrid year of Q4 FY2012 to Q3 FY2013.

First Class	
Automation Volume	40,959,365
Full Service Imb Volume	26,745,318
Percent Full Service Imb	65.3%
Automation Volume without Full Service Imb	14,214,047
Percent of First Class without FS Imb	34.7%

- A. Please confirm that, assuming no change in mailer behavior, 34.7 percent of First Class Automation volume will not qualify for automation rates starting January 26, 2014. If not confirmed, please explain.
- B. The following table details the First Class Automation letter volume for the hybrid year of Q4 FY2012 to Q3 FY2013.

	Volume (000)
Automation Letters	
Mixed AADC Automation	2,168,252
AADC Automation	8,161,742
3-Digit Automation	7,867,395
5-Digit Automation	19,895,054
Addi 2 to 3.5 Ounces	266,787
Full Service IMb	26,035,924
Total Volume	38,092,444

The rate category information provided by the Postal Service in the First Class, Standard Mail, Periodicals, and Bound Printed Matter cap calculation spreadsheets (and the underlying billing determinant spreadsheets) cannot be used to accurately determine the price cap impact of the Full Service IMb requirements. The Full Service IMb volume is only provided in the aggregate. The rate category of the 12.06 billion pieces of First Class Automation letters that are not Full Service IMb is not evident. Please provide disaggregated Full Service IMb volume for all categories of First Class, Standard, Periodicals, and Bound Printed Matter that will be affected by the Full Service IMb DMM change.

- C. Please provide cap calculation spreadsheets for First Class, Standard, Periodicals, and Bound Printed Matter that include the change in prices

for volume that is currently mailed at automation rates without a Full Service IMb.

3. The Postal Service has proposed FSS pricing for Periodicals, Standard, and Bound Printed Matter. Historical billing determinants have been adjusted to disaggregate volume to the new categories. Please provide the workpapers used to calculate the disaggregated volumes.
 - A. In file "CAPCAL-PER-R2013-10.xls" tab "Outside County," please confirm that "FSS Scheme" bundle volume is 0. Please discuss why no 5-digit or Carrier route bundles entered in the hybrid year are considered FSS Scheme bundles.
 - B. Will High Density Flat mailers be able to enter mail at DDU prices in FSS zones.

Respectfully Submitted,

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Docket No. R2013-10

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